

EXHIBIT A

Proposed Order

4818-9777-1812.1

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

| | | |
|----------------------------|---|-----------------------|
| -----X | : | |
| | : | Chapter 9 |
| In re | : | |
| | : | Case No. 13-53846 |
| CITY OF DETROIT, MICHIGAN, | : | |
| | : | Hon. Thomas J. Tucker |
| Debtor | : | |
| -----X | : | |

**ORDER GRANTING DEBTOR'S
FIFTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(No Basis Claims)**

Upon the fifteenth omnibus objection to claims, dated April 23, 2015 (the "Objection"),¹ of the Debtor, the City of Detroit, Michigan (the "City"), seeking entry of an order disallowing and expunging certain no basis claims as described in the Objection, and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be given; and no response to the Objection having been filed, other than as stated herein; and the Court finding that the legal and factual bases set forth in the Objection establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore;

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

IT IS ORDERED that:

1. The Objection is granted as set forth herein.
2. All of the proofs of claim listed in the “No Basis Claims” column in Exhibit 2 annexed to the Objection (the “No Basis Claims”) are hereby disallowed and expunged in their entirety, pursuant to Section 502(b) of the Bankruptcy Code, other than those to which a response was filed [Claim Nos. 2177, 3087 and 3471], and to which a stipulation was filed to adjourn the hearing [Claim No. 2780]. No other response was filed as to any claim on Exhibit 2.
3. The City’s claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.
4. The City’s rights and arguments in respect of any claims sought to be disallowed in the Objection that are not disallowed by this Order, are unaffected and preserved, and this Order has no res judicata, estoppel or other effect in respect of such remaining claims.
5. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
6. Each claim and the objections by the City to each claim as addressed in the Objection and set forth in Exhibit 2 of the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right to submit a separate order with respect to contested matters or claims.
7. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

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